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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 24 2009

REPLY TO THE ATTENTION OF:
E-19J

Norman Stoner, P.E.
Division Administrator
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

Re: **Comments on the Draft Environmental Impact Statement for Illinois Route 336 from Macomb Bypass to I-474 Peoria, CEQ# 20090208**

Dear Mr. Stoner:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the proposed Draft Environmental Impact Statement (DEIS) for Illinois Route 336 (IL 336) from the proposed Macomb Bypass in McDonough County to I-474 in Peoria County, Illinois. The project proposes to complete highway system linkages, facilitate transportation continuity, improve travel efficiency and thereby enhance economic stability in this corridor and region. The proposal includes a No-Build Alternative and a variety of Build Alternative alignments in five sections across the corridor. A Preferred Build Alternative is presented.

EPA has participated extensively in the NEPA process for this project, including early scoping comments, concurrence with Purpose and Need on September 9, 2005 at a merged NEPA / Clean Water Act Section 404 meeting, and concurrence with Alternatives to be Carried Forward on January 20, 2006.

The Federal Highway Administration (FHWA) previously studied a four-lane roadway Macomb Bypass. A Record of Decision (ROD) for the Macomb Bypass was signed by FHWA on November 4, 2004. Although the right-of-way for this corridor is protected, funding has not been secured, so construction has not begun. A recent FHWA review of that project, in March 2009, determined it was still NEPA compliant and could be constructed as approved in the 2004 EIS and ROD. Several mitigations for the Bypass project have already been constructed. The Macomb Bypass is incorporated in this DEIS as a completed project within the No-Build Alternative.

The present proposal therefore extends from the to-be-constructed Macomb Bypass on the east side of Macomb, as a four-lane divided expressway, passing around Canton and extending to just west of Hanna City, where it changes to a freeway design and interchanges at

I-474 on the west side of Peoria. The expressway portion will have a minimal number of at-grade intersections and afford local access, while the freeway portion will have limited access only at several grade-separated interchanges.

For ease of understanding the many alternative rights-of-way (ROW) being considered during development of this project, the approximately 60-mile corridor was divided into 5 segments, with each segment having multiple alternative ROW. EPA commends the Illinois Department of Transportation (IDOT) for its extensive research and public involvement to consider these many ROW options, and finally reduce them to a feasible minimum. The many requests and constraints that were considered makes this a model for Context Sensitive Solutions. It is clear that difficult decisions were made to reach the proposed Preferred Build Alternative as presented.

The proposed Preferred Build Alternative will have impacts to 4.86 acres of wetlands, 157 acres of forested land, and 2,015 acres of cropland, and will displace 23 residences and 4 businesses. These impacts and a more extensive list of considerations were analyzed in this NEPA documentation. We have reviewed these materials and provide the following comments consistent with the issues NEPA addresses, which are a project's Purpose and Need, Alternatives, Environmental Impacts, and Mitigation of Unavoidable Impacts.

PURPOSE AND NEED

The needs described for this proposal relate to facilitating movements within and through west central Illinois. Because a Quincy-to-Macomb four-lane highway has been constructed, one purpose of this proposal is to provide such an enhanced link between Macomb and Peoria. To enhance the Purpose and Need discussion, we recommend that the Final EIS (FEIS) include current and design-year average daily traffic (ADT), and vehicle miles traveled (VMT) data with and without the proposed project. Categorizing this information by trip type (e.g. regional through trips, Macomb to Peoria trips, and local trips) and vehicle types (e.g. auto, truck, farm) would provide readers with a clearer understanding of how the proposed project would benefit mobility in this section of Ilinois. Exhibit 3-3 provides an indication of the regional industries that might be served by the proposed improvements. Please discuss how these industries will benefit economically from the proposed new roadway. There may be additional supporting data, which, if presented, would support the proposal purpose and need further. We encourage such supporting information be included in the FEIS.

ALTERNATIVES

We commend the IDOT team and others involved in this project for their extensive public involvement and considerations to optimize roadway functionality and to reduce impacts to the human and natural environment. We anticipate meeting with this team at a NEPA / 404 merger meeting on September 9, 2009, and will discuss three minor adjustments of curves to possibly reduce surface water and forest impacts.

ENVIRONMENTAL IMPACTS

Impacts are inevitable when building a 60-mile road through this region of complicated resources. The dominant impact of the proposal is to 2,015 acres of active farmland. While this is regrettable, FHWA and IDOT made extensive efforts to minimize project impacts to many other resources. Our following comments are offered with the understanding that trade-offs have been made in considering alternatives and the public's long term costs compared to benefits. We commend FHWA and IDOT for their consideration for cumulative impacts as discussed in association with each type of impact.

AIR QUALITY

The DEIS correctly presents that this project location does not require conformity with a State Implementation Plan for Air Quality. Although modeling Mobile Source Air Toxics (MSATs) is a developing field of science, we recommend a qualitative assessment of these potential impacts is warranted in the FEIS. Because most of the project is located in areas of open farmland, identifying the locations and nature of exposure where MSATs may have impacts would be useful.

We recommend that IDOT commit to a construction diesel emissions reduction plan for this project. Although not required by EPA regulations, similar projects have included commitments to some or all of the following reduction methods. We note the proposal indicates methods for control of fugitive dust on this project and recommend consideration of the following additional options.

Options to consider in such a diesel emissions reduction plan include:

(a) retrofitting off-road construction equipment including repower or engine upgrades
(b) using ultra-low-sulfur fuels for all equipment
(c) limiting the age of on-road vehicles in construction projects to 1998 and newer and 1996 and newer for off-road equipment
(d) diesel particulate traps and oxidation catalysts
(e) using existing power sources or clean fuel generators rather than temporary power generators
(f) encouraging the use of off-road equipment that meets the Tier 3 standards.

WETLANDS

While we applaud the success in minimizing wetland impacts, as indicated above, we recommend that the FEIS include a summary table with associated illustration(s). This should at least provide a clear presentation identifying each wetland impacted, its description, quality, acreage, the nature of its buffer zone impacted, and specific mitigation data, including the compensation ratio, location, and special provisions for long-term success.

STREAMS AND FLOODPLAINS

Significant alignment adjustments were made to reduce impacts to streams and floodplains. We recommend the FEIS should likewise include a summary table with associated illustration(s) specifying each stream crossing and associated floodplain impact. We note that design features are routinely being planned for a 50-year flood level. We recommend these be redesigned taking forecast climate change and recent flooding history into consideration. We believe these considerations may warrant using a 100-year or even 500-year flood level reference in designing protection and bridging structures.

We recognize the state's best management practices for erosion control measures, but recommend consideration be given to utilizing compost blankets, berms and socks at points where rapid regrowth cover and long term utility are appropriate . Please refer to <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=browse&Rbutton=detail&bmp=119&minmeasure=4> and related adjacent EPA websites.

FORESTS

Here again, FHWA and IDOT have reduced significant impacts to some prime forest lands in the region. By utilizing the IL-95 existing ROW, several hundred acres have been spared. The DEIS indicates that 91 acres of the 157 acres to be impacted are "forest edge impacts," and that this represents a lower quality of woodland. The DEIS goes on to correctly explain how these "forest edge" zones function in some unique ways both for the forest and for wildlife habitat. We recommend that these necessary functions be recognized when considering upland forest mitigation. That consideration should reflect that the widened roadway will impact the now exposed mature forest and have an indirect impact, which will be the loss of these edge acres as they convert to "forest edge zones."

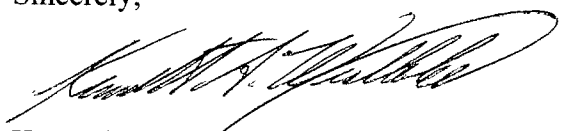
We appreciate the intent to plant replacement trees appropriate for the size and species impacted. We encourage finding additional sites for this mitigation, so that all direct and indirect impacts can be adequately mitigated. We further recommend that because the trees being impacted by the project are of significant size and species, the project proponents commit to monitoring and maintaining the replacement trees for 10 years to assure their success.

MITIGATION of UNAVOIDABLE IMPACTS

Many other impacts are appropriately addressed in the DEIS, including mitigation proposals. We recommend, as above, that a summary table be included in the FEIS, clarifying each impact within categories, and provide sufficient information for each specific impact and associated mitigation to be identified and understood as to location, nature of what is impacted (i.e. size, quality, description, etc.), and the specifics concerning mitigation for that impact.

We appreciate the opportunity to review this document. If you have any questions, or wish to discuss our comments further, please contact me or Norm West of my staff at (312)-353-5692 or at west.norman@epa.gov.

Sincerely,



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